

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KASSANDRA LUDINGTON, et al.

Plaintiffs,

Case No. 2:25-cv-10307

v.

Hon. Jonathan J.C. Grey

CITY OF DETROIT, a Michigan Municipal
Corporation, and THE DETROIT LAND
BANK AUTHORITY, a public body
corporate,

Mag. Judge David R. Grand

Defendant.

DEFENDANTS' UNOPPOSED MOTION TO EXTEND PAGE LIMIT

The City of Detroit and the Detroit Land Bank Authority (collectively, the “Defendants”) by and through their counsel, respectfully request leave to file a brief supporting their Motion to Dismiss Plaintiffs’ First Amended Complaint under Rule 12(b)(1) and Rule 12(b)(6) in excess of the page limit. In support of this request, Defendants state:

1. Plaintiffs filed a 66-page First Amended Complaint alleging seven counts. Plaintiffs’ First Amended Complaint also includes approximately 190 pages of exhibits. (ECF No. 13).

2. Pursuant to E. D. Mich. LR 7.1(d)(3), a brief supporting a motion may not exceed 25 pages. However, the Rule permits parties to apply *ex parte* to file a

longer brief. Moreover, this Court has encouraged parties to request a page limit extension “[w]hen page limits are inadequate for a party’s needs” *Elhady v Bradley*, 438 F. Supp. 3d 797, 821 n. 11 (E.D. Mich. 2020).

3. Defendants request leave to file a brief not to exceed 45 pages in support of its Motion to Dismiss Plaintiffs’ First Amended Complaint, in order to address the full scope of issues raised by Plaintiffs’ First Amended Complaint.

4. Defendants have attempted to limit the length of the brief without sacrificing clarity and/or its ability to address the factual and legal issues supporting its Motion. However, due to the number of legal issues needing to be addressed, Defendants, through counsel, have been unable to limit the brief to 25 pages.

5. Additionally, Defendants’ brief includes photographs of each of the properties at issue for illustrative purposes. These photographs increase the length of the brief, but do not place additional demands upon the Court’s resources.

6. Counsel for Defendants requested concurrence in this motion from counsel for Plaintiffs. Plaintiffs do not oppose Defendants’ request.

WHEREFORE, Defendants respectfully requests that this Court permit it to file a Brief not to exceed 45 pages in support of its Motion to Dismiss Plaintiffs’ First Amended Complaint Under Rule 12(b)(1) and Rule 12(b)(6).

Dated: June 16, 2025

Respectfully submitted,

/s/ David H. Fink

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